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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KAYLA GAGNON and LAUREN COLON,

Plaintiffs,

v.

REVIVE HEALTH SENIOR CARE  
MANAGEMENT, LLC, a domestic limited  
liability company, doing business as ALTA  
SKILLED NURSING AND  
REHABILITATION CENTER; and DOES I-  
XX inclusive,

Defendant.

Case No. 3:25-cv-00035-ART-CSD

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT’S DEADLINE TO  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFFS’ FIRST AMENDED  
COMPLAINT**

**(Second Request)**

Defendant Revive Health Senior Care Management, LLC doing business as Alta Skilled Nursing and Rehabilitation Center (“Revive” or “Defendant”) and Plaintiffs Kayla Gagnon and Lauren Colon (“Plaintiffs”), by and through their respective counsel of record, hereby agree, stipulate and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiffs’ First Amended Complaint by 30 days, from June 6, 2025 to July 7, 2025.

The Court previously granted an extension of Defendant’s deadline to respond to the Amended Complaint from May 6, 2025 to June 6, 2025. This is the second request to extend the responsive pleading deadline for the Amended Complaint.

1 The parties request this extension for Defendant to answer or otherwise respond to the  
2 Amended Complaint because the parties are continuing to actively engage in global settlement  
3 discussions. Counsel for both parties have exchanged settlement proposals, and are continuing to  
4 engage in negotiations. The undersigned represent that this stipulation is not designed for purposes  
5 of delay.

6 Dated: June 3, 2025.

7 McDONALD CARANO LLP

JEPSEN LAW, PLLC

8 By: /s/ Daniel I. Aquino

By: /s/ Kendra J. Jepsen

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*Attorney for Plaintiffs*

13  
14 *Attorneys for Defendant*

15 IT IS SO ORDERED:

16 

17 UNITED STATES MAGISTRATE JUDGE

18 DATED: June 4, 2025